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Attorneys for Creditor Italian Luxury Group, LLC

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re

CRESTLLOYD, LLC,

Debtor.

Case No. 2:21-bk-18205-DS

Chapter 11

NON-MATERIAL AMENDMENT TO
"NOTICE OF LIEN ON CLAIM
NUMBER 22-1 OF CREDITOR NILE
NIAMI" [DOC NO. 615]

FLP Law Group LLP ("**FLP**"), counsel for judgment creditor Italian Luxury Group, LLC ("**ILG**") hereby submits this Amended Notice of Lien. An un-certified copy of ILG's September 11, 2024 judgment against Nile Miami (the "**Judgment**") is "**Exhibit 1**" to the

1 original Notice of Lien. A certified copy of the Judgment is attached to this Amended
2 Notice of Lien as **“Exhibit A.”**
3

4 DATED: January 16, 2025

FLP LAW GROUP LLP

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6 By: 

Marc A. Lieberman, Esq.

Alan W. Forsley, Esq.

Attorneys for Creditor Italian Luxury Group, LLC
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EXHIBIT A

JUD-100

Electronically Received 08/13/2024 04:17 PM

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): Nick M Campbell, SBN 185590 BUILDERS LAW GROUP, INC. 9767 Via Roma Burbank CA 91504 TELEPHONE NO.: 818-381-5716 FAX NO. (Optional): 818-450-0542 E-MAIL ADDRESS (Optional): nick@builderslawgroup.com ATTORNEY FOR (Name): Italian Luxury Group, LLC		FOR COURT USE ONLY FILED Superior Court of California County of Los Angeles 09/11/2024 David W. Shayton, Executive Officer / Clerk of Court By: <u>S. Luqueno</u> Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Stanley Mosk Courthouse		
PLAINTIFF: ITALIAN LUXURY GROUP, LLC DEFENDANT: NILE MIAMI, 10701 BELLAGIO ROAD, LLC, etc. et al.		
JUDGMENT <input type="checkbox"/> By Clerk <input checked="" type="checkbox"/> By Default <input type="checkbox"/> After Court Trial <input checked="" type="checkbox"/> By Court <input type="checkbox"/> On Stipulation <input type="checkbox"/> Defendant Did Not Appear at Trial		CASE NUMBER: 24STCV02198

JUDGMENT

1. ☒ **BY DEFAULT**
- Defendant was properly served with a copy of the summons and complaint.
 - Defendant failed to answer the complaint or appear and defend the action within the time allowed by law.
 - Defendant's default was entered by the clerk upon plaintiff's application.
 - ☐ Clerk's Judgment (Code Civ. Proc., § 585(a)). Defendant was sued only on a contract or judgment of a court of this state for the recovery of money.
 - ☒ Court Judgment (Code Civ. Proc., § 585(b)). The court considered
 - ☐ plaintiff's testimony and other evidence.
 - ☒ plaintiff's written declaration (Code Civ. Proc., § 585(d)).
2. ☐ **ON STIPULATION**
- Plaintiff and defendant agreed (stipulated) that a judgment be entered in this case. The court approved the stipulated judgment and
 - ☐ the signed written stipulation was filed in the case.
 - ☐ the stipulation was stated in open court ☐ the stipulation was stated on the record.
3. ☐ **AFTER COURT TRIAL.** The jury was waived. The court considered the evidence.
- The case was tried on (date and time):
before (name of judicial officer):
 - Appearances by:

☐ Plaintiff (name each):
(1)
(2)
☐ Continued on Attachment 3b.

☐ Defendant (name each):
(1)
(2)
☐ Continued on Attachment 3b.

☐ Plaintiff's attorney (name each):
(1)
(2)

☐ Defendant's attorney (name each):
(1)
(2)
 - ☐ Defendant did not appear at trial. Defendant was properly served with notice of trial.
 - ☐ A statement of decision (Code Civ. Proc., § 632) ☐ was not ☐ was requested.

PLAINTIFF: ITALIAN LUXURY GROUP, LLC	CASE NUMBER: 24STCV02198
DEFENDANT: NILE MIAMI, 10701 BELLAGIO ROAD, LLC, etc. et al.	

JUDGMENT IS ENTERED AS FOLLOWS BY: ☒ THE COURT ☐ THE CLERK

4. ☐ Stipulated Judgment. Judgment is entered according to the stipulation of the parties.

5. Parties. Judgment is

a. ☒ for plaintiff (name each):
ITALIAN LUXURY GROUP, LLC

c. ☐ for cross-complainant (name each):

and against defendant (names):
SEE ATTACHMENT "A"

and against cross-defendant (name each):

☒ Continued on Attachment 5a.

☐ Continued on Attachment 5c.

b. ☐ for defendant (name each):

d. ☐ for cross-defendant (name each):

6. Amount.

a. ☒ Defendant named in Item 5a above must pay plaintiff on the complaint:

c. ☐ Cross-defendant named in item 5c above must pay cross-complainant on the cross-complaint:

		\$2,407,595.15
(1)	<input checked="" type="checkbox"/> Damages	\$9,607,501.15
(2)	<input checked="" type="checkbox"/> Prejudgment interest at the annual rate of 12 %	\$725,041.48
(3)	<input checked="" type="checkbox"/> Attorney fees	\$25,965.91
(4)	<input checked="" type="checkbox"/> Costs	\$1,136.02
(5)	<input type="checkbox"/> Other (specify):	\$
		\$3,159,738.56
(6)	TOTAL	\$10,359,734.56

(1)	<input type="checkbox"/> Damages	\$
(2)	<input type="checkbox"/> Prejudgment interest at the annual rate of %	\$
(3)	<input type="checkbox"/> Attorney fees	\$
(4)	<input type="checkbox"/> Costs	\$
(5)	<input type="checkbox"/> Other (specify):	\$
(6)	TOTAL	\$

b. ☐ Plaintiff to receive nothing from defendant named in Item 5b.
☐ Defendant named in Item 5b to recover costs \$
☐ and attorney fees \$

d. ☐ Cross-complainant to receive nothing from cross-defendant named in item 5d.
☐ Cross-defendant named in Item 5d to recover costs \$
☐ and attorney fees \$

7. ☒ Other (specify):
Plaintiff is also entitled to post-judgment interest on the judgment amount at the statutory rate; and costs of collection, including attorney's fees. Judgment is, both and several as to all defendants.

Date: 09/11/2024

☐



JUDICIAL OFFICER

Daniel S. Murphy / Judge

Date:

☐

Clerk, by _____, Deputy



CLERK'S CERTIFICATE (Optional)

I certify that this is a true copy of the original judgment on file in the court.

Date: JAN 14 2025

David W. Slayton

Clerk, by _____

A. Corona

, Deputy

A. CORONA

Page 2 of 2

MC-025

SHORT TITLE:
Italian Luxury Group, LLC v. Nile Miami, et al.

CASE NUMBER:
24STCV02198

ATTACHMENT (Number): A

(This Attachment may be used with any Judicial Council form.)

5.a. for plaintiff (name each): ITALIAN LUXURY GROUP, LLC and against defendant (names):

NILE MIAMI,

10701 BELLAGIO ROAD, LLC, a California limited liability company;

CARCASSONNE FINE HOMES, LLC, a California limited liability company;

1369 LONDONDERRY ESTATE, LLC, a California limited liability company;

JULIAMI ART VENTURES, LLC, a California limited liability company;

MARBELLA CONSTRUCTION, INC., a California corporation.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 3 of 3

(Add pages as required)

PROOF OF SERVICE (C.C.P. §1013a, 2015.5)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I, Emily M. Campbell, am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 9767 Via Roma, Burbank, CA 91504.

On Tuesday, August 13, 2024, I served the foregoing document entitled:

JUDGMENT

- ☐ by placing the original copies thereof enclosed in sealed envelopes, addressed as follows
- ☒ by placing the true copies thereof enclosed in sealed envelopes, addressed as follows:
- ☐ by serving a copy electronically upon the following:

SEE ATTACHED SERVICE LIST

☒ **BY MAIL** I caused such envelope(s) to be deposited in the County of Los Angeles, State of California, with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collecting and processing correspondence for mailing. Under that practice it would be deposited with the United States Postal Service on that same day with postage thereon fully prepaid.

☐ **BY ESERVICE** I caused such documents to be electronically filed through the OneLegal portal, and to be e-served on the above named participants.

☐ **BY FACSIMILE TRANSMISSION** I caused a true copy of the foregoing document to be transmitted on this date to each of the parties above at the facsimile machine telephone number listed above and as last given by that person on any document filed in this action and served upon this office.

☐ **BY HAND DELIVERY** I placed a true copy of the foregoing document in a sealed envelope addressed to the parties identified above, and caused such a package to be hand delivered to an authorized courier or driver for hand delivery.

☐ **BY EMAIL TRANSMISSION** I caused a true copy of the foregoing document to be transmitted on this date to each of the parties above at the email address listed above and as last given by that person on any document filed in this action and served upon this office.

☐ **BY OVERNIGHT DELIVERY** I caused a true copy of the foregoing document, enclosed in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses listed above. I place the envelope or package for collection and overnight delivery at an office or regularly utilized drop box of the overnight delivery carrier.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed: August 13, 2024

Emily M. Campbell
Name


Signature

SERVICE LIST

Nile Niami 1110 North Virgil Ave., Unit 362 Los Angeles, CA 90029	10701 Bellagio Road, LLC REGISTERED AGENT FOR SERVICE OF PROCESS: LEGALZOOM.COM 101 N. Brand Blvd., 11 th Floor Glendale, CA 91203
Carcassonne Fine Homes, LLC REGISTERED AGENT FOR SERVICE OF PROCESS: LEGALZOOM.COM 101 N. Brand Blvd., 11 th Floor Glendale, CA 91203	1369 Londonderry Estate, LLC REGISTERED AGENT FOR SERVICE OF PROCESS: LEGALZOOM.COM 101 N. Brand Blvd., 11 th Floor Glendale, CA 91203
Juliami Art Ventures, LLC REGISTERED AGENT FOR SERVICE OF PROCESS: LEGALZOOM.COM 101 N. Brand Blvd., 11 th Floor Glendale, CA 91203	Marbella Construction, Inc. REGISTERED AGENT FOR SERVICE OF PROCESS: LEGALZOOM.COM 101 N. Brand Blvd., 11 th Floor Glendale, CA 91203

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

FLP LAW GROUP LLP 1875 Century Park East, Suite 2230, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **NON-MATERIAL AMENDMENT TO "NOTICE OF LIEN ON CLAIM NUMBER 22-1 OF CREDITOR NILE NIAMI" [DOC NO. 615]** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

I. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **January 17, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

II. **SERVED BY UNITED STATES MAIL:**

On (*date*) January 17, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Nile Niami

Hamid R. Rafatjoo/ Raines Feldman LLP
1800 Avenue of the Stars, 12th Floor
Los Angeles, CA 90067

Nile Niami

1110 North Virgil Ave., Unit 362
Los Angeles, CA 90029

LEGALZOOM.COM, Registered Agent for
10701 Bellagio Road, LLC; Carcassonne Fine
Homes, LLC, 1369 Londonderry Estate, LLC;
Juliami Art Ventures, LLC; Marbella Construction,
Inc.
101 N. Brand Blvd., 11th Floor
Glendale, CA 91203

☐ Service information continued on attached page

III. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**
(*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service,

or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 17, 2025 ANDREA HANSEN
Date Printed Name


Signature

ADDITIONAL SERVICE LIST
VIA ECF

- **Kyra E Andrassy** kandrassy@raineslaw.com, bclark@raineslaw.com;jfisher@raineslaw.com
- **Todd M Arnold** tma@lnbyg.com
- **Jerrold L Bregman** jbregman@bg.law, ecf@bg.law
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- **Hamid R Rafatjoo** hrafatjoo@raineslaw.com, bclark@raineslaw.com;jfisher@raineslaw.com
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- **Howard Steinberg** steinbergh@gtlaw.com, pearsallt@gtlaw.com;NEF-BK@gtlaw.com;howard-steinberg-6096@ecf.pacerpro.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov
- **Daniel Wall** dwall@wallinrussell.com
- **Genevieve G Weiner** gweiner@sidley.com, laefilingnotice@sidley.com;genevieve-weiner-0813@ecf.pacerpro.com;psantos@sidley.com
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- **Jessica Wellington** jwellington@bg.law, ecf@bg.law